

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

RIPPY OIL CO.

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v.

**ACE AMERICAN INSURANCE CO.,
CHARTIS SPECIALTY INSURANCE
CO., RISK SPECIALISTS
COMPANIES INS. AGENCY, INC.**

Civil Case Number: 4:22-cv-00276

(JURY REQUESTED)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE
PLEADINGS**

ACE American Insurance Company (“ACE”) respectfully requests an extension of time to reply to Rippy Oil Company’s (“Rippy Oil”) Response in Opposition to Defendant’s Motion to Dismiss, or in the Alternative, Transfer or Stay, filed on March 23, 2022. In support, ACE would show the Court as follows:

1.

Rippy Oil filed its Response in Opposition to Defendant’s Motion to Dismiss, or in the Alternative, Transfer or Stay¹ on March 23, 2022.

2.

The 7-day deadline in which to reply to Rippy Oil’s Response in Opposition originally fell on March 30, 2022. *See* Fed. Rule Civ. Pro. 27(a)(4).

3.

¹ *See* R. Doc. 23.

ACE previously requested and was granted a thirty (30) day extension of time, up to and including April 29, 2022, in which to reply to Rippy Oil's Response in Opposition.²

4.

ACE requests an additional seven (7) day extension of time, up to and including May 6, 2022, in which to reply to Rippy Oil's Response in Opposition.

5.

Counsel for Rippy Oil has been contacted and indicated they have no opposition to the extension of time requested by ACE herein.

6.

There is good cause for the extension of time. Due to the complexity of the issues involved, and conflicts in the availability of company representatives to verify the substance of the briefing ACE is presenting to this Court, ACE requires a short, seven (7) day extension of time to file its pleadings in this matter.

7.

The brief extension requested will not interfere with or otherwise impact the May 26, 2022, Initial Pretrial and Scheduling Conference.³

Considering the forgoing, ACE respectfully requests that this Honorable Court enter an order granting it a seven (7) day extension of time, up to and including May 6, 2022, to file its reply to Rippy Oil's Response in Opposition to Defendant's Motion to Dismiss, or in the Alternative, Transfer or Stay, and for such further relief to which this Court finds ACE as justly entitled.

² See R. Doc. 25; see also R. Doc. 29.

³ See R. Doc. 5.

Respectfully submitted,

BROWN SIMS, PC

BY: /s/ *Thear J. Lemoine*

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**Attorneys for ACE American Insurance
Company**

CERTIFICATE OF CONFERENCE

I certify that counsel for ACE American Insurance have conferred with all counsel of record, who have indicated no opposition to this Unopposed Motion for Extension of Time to File Responsive Pleadings.

/s/ *Thear J. Lemoine*

Thear J. Lemoine

CERTIFICATE OF SERVICE

I hereby certify that on this Friday, April 29, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ *Thear J. Lemoine*

Thear J. Lemoine